

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF NEW YORK (BROOKLYN)

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Return Date: January 9, 2020  
Time: 12:00 PM  
Case No.: 1-19-46882-cec

In Re:

In Proceeding for

MICHAEL L STATHAKIS  
*aka Michael Larry Stathakis*  
*fdba Whisk Remodeling Corp.*

Chapter 7

Debtor(s)

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**AMENDED NOTICE OF MOTION TO ENTER INTO LOSS MITIGATION**

**PLEASE TAKE NOTICE** that upon the annexed motion, the Debtor, through his attorney, Btzalel Hirschhorn, Esq., will move this Court before the Honorable Carla Craig Bankruptcy Judge at the United States Bankruptcy Court at 271 Cadman Plaza East, Brooklyn, NY, Courtroom – 3529, on the **9<sup>th</sup> day of January, 2020 at 12:00 P.M.** or soon thereafter as counsel can be heard, for an Order directing the Debtor and Creditor 21st Century Mortgage Co. [Loan No. 7113] to participate in the Loss Mitigation Program, with respect to property located at 21-28 72nd Street, Jackson Heights, NY 11370.

Responsive papers shall be filed with the Bankruptcy Court and personally served upon the attorney for the Debtor, Btzalel Hirschhorn, Esq., no later than five (5) days prior to the hearing date set forth above. Any responsive papers shall be in conformity with the Federal Rules of Civil Procedure and indicate the entity submitting the response, the nature of the response and the basis of the response.

Dated: December 3, 2019  
Kew Gardens, New York

/s/ Btzalel Hirschhorn, Esq.  
BTZALEL HIRSCHHORN, ESQ.  
**SHIRYAK, BOWMAN, ANDERSON, GILL & KADOCHNIKOV, LLP**

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TO

Via First Class Mail:

**Robert J Musso, Esq.**

26 Court Street

Suite 2211

Brooklyn, NY 11242

*Trustee*

**Office of the United States Trustee**

Eastern District of NY (Brooklyn Office)

U.S. Federal Office Building

201 Varick Street, Suite 1006

New York, NY 10014

Zann Welch

Claims Processor, Bankruptcy Servicer for BMW Financial Services NA, LLC

AIS Portfolio Services, LP

4515 N Santa Fe Avenue, Dept. APS

Oklahoma City, OK 73118

*Notice of Appearance Filed*

THE LAW OFFICE OF MICHAEL C. D'ARIES, LLC

Michael C. D'Aries, Esq.

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Harrison NJ 07029

*Attorneys for 21<sup>st</sup> Century Mortgage Corporation*